

EXHIBIT E32

1 SUPERIOR COURT OF WASHINGTON
2 FOR KING COUNTY
3 JODY E. RATCLIFF,)
4 Plaintiff,)
5 v.) No. 16-2-18128-7
6 BORGWARNER MORSE TEC) SEA
7 LLC, et al.,)
8 Defendants.)

9 THURSDAY, FEBRUARY 1, 2018

10 - - -

11 Videotaped Deposition of Frederick
12 Pooley, Ph.D., held at the offices of Orrick,
13 Herrington & Sutcliffe LLP, 51 West 52nd
14 Street, New York, New York, commencing at
15 9:31 a.m., on the above date, before Carrie
16 A. Campbell, Registered Diplomate Reporter,
17 Certified Realtime Reporter, Illinois,
18 California & Texas Certified Shorthand
19 Reporter, Missouri & Kansas Certified Court
20 Reporter.

21 - - -

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<p style="text-align: right;">Page 34</p> <p>1 control, you know, internationally over the 2 source of their materials. 3 Q. I asked you a little bit about 4 Italy. 5 Did you visit the mine in Italy 6 where Johnson & Johnson at one point sourced 7 talc from? 8 A. Yes, the Val Chisone mine. 9 Yeah. Yeah. 10 Q. And did you go there in person? 11 A. Oh, yes. Yep. Very 12 interesting visit, yeah. 13 Q. And you mentioned you called it 14 the Val Chisone mine? 15 A. Yeah. 16 Q. Can you describe the area that 17 that's located? 18 A. It's in the north of Italy, 19 just not far from the border with France, 20 just where the Alps start to develop. So it 21 was very, very mountainous, very picturesque, 22 and it was very difficult to get to the mine 23 actually. They had a ski lift installed 24 there to take workers in to work when the 25 snow is on the ground.</p>	<p style="text-align: right;">Page 36</p> <p>1 you want to put it that way, associated with 2 that. They produce dust and they're exposed 3 to dust and they have pneumoconiosis cases 4 where the dust exposure has been severe, but 5 there's no major concern about controlling 6 the dust at that time. It's probably -- it 7 may have changed now, but... 8 Q. In the testing that you did on 9 the two ore deposits and also baby powder 10 products with talc in them, were you ever 11 able to determine whether or not either the 12 ore or any of the baby powder had asbestos in 13 it? 14 A. Well, we were -- part of a 15 visit like that to take samples is to look 16 around to see if you can see anything which 17 might represent an asbestos-type contaminant. 18 And although looking at the rock specimens we 19 brought back, there were amphibole minerals, 20 but there was no obvious asbestos visible in 21 the mine. 22 Q. And after all the testing that 23 you did, were you able to ever find asbestos 24 in the samples or the deposit samples that 25 you looked at?</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. And did you also visit a talc 2 deposit in Windsor, Vermont, where Johnson & 3 Johnson at one point sourced talc from? 4 A. Yes. 5 Q. And were you there personally? 6 A. Oh, yes. Yeah. 7 Q. And did you test the ore 8 deposit in Vermont as well as product, baby 9 powder, that used the talc from that ore? 10 A. Yes. As with the Italian mine, 11 we -- I paid a visit there and arranged a 12 sample myself, underground to take samples, 13 to look at representative impurities that 14 might get into the talc product. 15 Q. And you told us that you were a 16 coal miner, so I take it you have experience 17 in mines, right? 18 A. Yes. Lots of it, yeah. 19 Q. And when you visited these ore 20 deposits in Italy and Vermont, did you ever 21 wear a respirator? 22 A. No. No. 23 Q. Why not? 24 A. Well, the mining of deposits 25 like talc, there is not a lot of disease, if</p>	<p style="text-align: right;">Page 37</p> <p>1 A. No. Mineral types, yeah, 2 amphibole mineral, but no asbestos, no. 3 Q. And were you experienced with 4 the test methods that you used? 5 A. To examine these specimens? 6 Q. Yes. 7 A. Oh, yes, I was, you know. 8 Q. Do you know of anyone who had 9 more experience in the 1970s than you in 10 testing the ore deposits that you tested? 11 A. I don't know, but there were 12 probably people around who would have done a 13 similar job if it was presented to them, but, 14 you know, we're few and far between. 15 Q. Let me talk about the deposit 16 in Vermont, the Windsor area. You were 17 familiar with that? 18 A. Yeah. 19 (Pooley Exhibit 2 marked for 20 identification.) 21 QUESTIONS BY MR. BICKS: 22 Q. And let me show you what we'll 23 mark as Exhibit 2, if Carrie can show you 24 that. 25 This is an article, I take it,</p>

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<p style="text-align: right;">Page 38</p> <p>1 that you are familiar with?</p> <p>2 A. Yeah. I have seen this, yes.</p> <p>3 Q. And this is -- there's some</p> <p>4 people on here: Maryanne Boundy, Karen Gold,</p> <p>5 Kenneth Martin, William Burgess and John</p> <p>6 Dement.</p> <p>7 In your experience in dealing</p> <p>8 with dust and mines and so forth, are these</p> <p>9 names familiar to you?</p> <p>10 A. Well, the one name is, John</p> <p>11 Dement. I know him quite well. We've</p> <p>12 actually published papers together.</p> <p>13 Q. Yeah.</p> <p>14 A. Yeah, but --</p> <p>15 Q. And what about here, the</p> <p>16 Department of Environmental Health Sciences,</p> <p>17 Harvard School of Public Health in</p> <p>18 Massachusetts, have you heard of that</p> <p>19 organization?</p> <p>20 A. Yes.</p> <p>21 Q. And I'm focusing here when</p> <p>22 we're talking about Vermont, and I'm</p> <p>23 highlighting here: "Since geological studies</p> <p>24 dating back from the early 1900s have shown</p> <p>25 that the Vermont talc deposits contain no</p>	<p style="text-align: right;">Page 40</p> <p>1 samples here.</p> <p>2 Q. And this is kind of -- if we</p> <p>3 start the story, this is -- appears to be one</p> <p>4 of the first things that you did; is that</p> <p>5 right?</p> <p>6 A. Yeah, that's right.</p> <p>7 Q. And if we look at this</p> <p>8 document, and I'm highlighting stuff on the</p> <p>9 screen here, it says right here that these</p> <p>10 are identity samples submitted to Fred Pooley</p> <p>11 at University College?</p> <p>12 A. Yes.</p> <p>13 Q. That's you, right?</p> <p>14 A. Yes.</p> <p>15 Q. All right. And it indicates</p> <p>16 here that these are samples of Vermont</p> <p>17 production talc, Windsor 66, which is used in</p> <p>18 the manufacture of Johnson's baby powder.</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Are you familiar with the</p> <p>22 numbers Windsor 66?</p> <p>23 A. Yeah, I'm familiar with Windsor</p> <p>24 Minerals. The 66, yes.</p> <p>25 Q. And you'll see that there's a</p>
<p style="text-align: right;">Page 39</p> <p>1 asbestos."</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And is that a view that in the</p> <p>5 work that you did over the years that we'll</p> <p>6 talk about that you -- was consistent with</p> <p>7 what you concluded?</p> <p>8 A. Yes.</p> <p>9 Q. And I'd like to show you</p> <p>10 some -- a study that you did, and I'm going</p> <p>11 to ask you some questions about it.</p> <p>12 A. Okay.</p> <p>13 (Pooley Exhibit 3 marked for</p> <p>14 identification.)</p> <p>15 QUESTIONS BY MR. BICKS:</p> <p>16 Q. And I think this is the third</p> <p>17 exhibit, and you have this in front of you,</p> <p>18 Dr. Pooley.</p> <p>19 A. Yeah. Yeah, I've got it.</p> <p>20 Q. And this is a report that you</p> <p>21 wrote?</p> <p>22 A. Uh-huh.</p> <p>23 Q. And you did several reports on</p> <p>24 talc out of the Vermont deposit, right?</p> <p>25 A. Yes, I looked at quite a few</p>	<p style="text-align: right;">Page 41</p> <p>1 description here of where these came from and</p> <p>2 it says here that, "Our quality assurance</p> <p>3 division takes a sampling at random from a</p> <p>4 production line during each shift."</p> <p>5 And as somebody who deals with</p> <p>6 talc testing, are you familiar with kind of</p> <p>7 how that works?</p> <p>8 A. Yes, they quality control, you</p> <p>9 know. Yeah.</p> <p>10 Q. And if we look later on, we</p> <p>11 have here your report on these samples,</p> <p>12 right?</p> <p>13 A. Yep.</p> <p>14 Q. And we can see here that you</p> <p>15 looked at ten samples, right?</p> <p>16 A. Yes.</p> <p>17 Q. And in terms of what you were</p> <p>18 doing in this report, it says that you were</p> <p>19 doing analysis performed, were implemented to</p> <p>20 establish the presence of asbestos fiber of</p> <p>21 the chrysotile or amphibole types.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. And is that analysis that you</p> <p>25 did?</p>

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<p style="text-align: right;">Page 210</p> <p>1 you've done work for the World Health 2 Organization. 3 A. No, I didn't say that at all. 4 Q. Sure, the jury heard it. It 5 was on your CV. 6 Now, the bottom line is, is 7 you've talked about talc mines being 8 contaminated by asbestos yourself, haven't 9 you? 10 A. I can't remember. 11 Q. Well, here's your CV. 12 A. Yeah. 13 Q. Exhibit 1. It's one of the 14 things that you put on your brag sheet, your 15 stud sheet. 16 A. Yeah. 17 MR. BICKS: Objection to the 18 form. 19 QUESTIONS BY MR. LANIER: 20 Q. Consultant on biological 21 effects of mineral dusts, collection and 22 quantification to World Health Organization. 23 A. That's right. 24 Q. So I said that's one of things 25 that you bragged about on your CV, and you</p>	<p style="text-align: right;">Page 212</p> <p>1 A. Other sources of material that 2 are referred to as being asbestos, yes. 3 (Pooley Exhibit 27 marked for 4 identification.) 5 QUESTIONS BY MR. LANIER: 6 Q. Yeah. 7 And I've handed you Exhibit 8 Number 28. If we go back to something you 9 wrote back in 1992, this is -- did I put a 10 sticker on your copy, sir? 11 A. Yes. 12 Q. What does that sticker say? 13 A. Exhibit 27. 14 Q. And it's this article? Okay. 15 I went out of the order. Thank you very 16 much. 17 This is Exhibit 27. 18 A. Talc pneumoconiosis. 19 Q. Yeah. Yeah. Yeah. 20 A. The pathological and 21 mineralogical study. 22 Q. You're the F.D. Pooley on this, 23 aren't you? 24 A. That's right. 25 Q. And you've got here -- I think</p>
<p style="text-align: right;">Page 211</p> <p>1 said no. 2 I mean, it's on there; I didn't 3 make that up, did I? 4 A. No. No. 5 Q. And now you're saying that 6 they're garbage and not to be believed? 7 MR. BICKS: Objection. 8 THE WITNESS: No, I'm referring 9 to the document you gave me. 10 QUESTIONS BY MR. LANIER: 11 Q. Well, sir, I'll refer to a 12 document you wrote -- 13 A. Which has got chrysotile 14 asbestos written on it. 15 Q. Yeah. 16 Well, chrysotile is asbestos, 17 isn't it? 18 A. Oh, sure it is. Yeah. Yeah. 19 Q. Okay. And those aren't the 20 only kinds. The asbestos isn't just 21 chrysotile and tremolite. There are other 22 varieties of asbestos, aren't there? 23 Aren't there? 24 A. Yes, there are. 25 Q. And --</p>	<p style="text-align: right;">Page 213</p> <p>1 there's a typo because it says "tail" when it 2 ought to say "talc." 3 A. Sure. 4 Q. That should be "talc," right? 5 A. Yep. 6 Q. All right. "Minerals that may 7 contaminate talc include tremolite" -- 8 Do you see that? 9 A. Yeah. 10 Q. -- "anthophyllite" -- 11 Do you see that? 12 A. Yeah. 13 Q. Anthophyllite, I guess. I 14 don't ever pronounce it right. 15 -- "antigorite" -- 16 A. Yeah. 17 Q. -- "chrysotile"? 18 A. Yeah. 19 Q. Those are asbestos, aren't 20 they? 21 A. Yeah. 22 And you've forgotten tremolite, 23 didn't you? 24 Q. Yeah. 25 A. Yeah.</p>

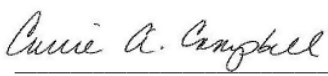
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<p style="text-align: right;">Page 214</p> <p>1 Q. They're asbestos.</p> <p>2 A. Yeah, fibrous and nonfibrous.</p> <p>3 Q. Uh-huh. Both of them. Both</p> <p>4 kinds.</p> <p>5 A. Yeah. Sure.</p> <p>6 Q. You, when you weren't getting</p> <p>7 paid by Johnson & Johnson, you're publishing</p> <p>8 and you're saying in publication that talc</p> <p>9 has got -- you've got talc contaminated with</p> <p>10 tremolite.</p> <p>11 What were the other asbestos</p> <p>12 minerals? Anthophyllite?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Oops, I didn't spell it right.</p> <p>15 Anthophyllite. That's close enough.</p> <p>16 Chrysotile?</p> <p>17 A. Uh-huh.</p> <p>18 Q. Says antigorite. Is that an</p> <p>19 asbestos mineral?</p> <p>20 A. No.</p> <p>21 Q. Okay. If we go back to the</p> <p>22 WHO, World Health Organization, document</p> <p>23 which was exhibit number -- do you remember?</p> <p>24 You've got the marked one.</p> <p>25 A. 26.</p>	<p style="text-align: right;">Page 216</p> <p>1 Q. Of course, that flies in the</p> <p>2 face of everything you've told the jury</p> <p>3 today, doesn't it?</p> <p>4 MR. BICKS: Objection to the</p> <p>5 form.</p> <p>6 QUESTIONS BY MR. LANIER:</p> <p>7 Q. Doesn't it?</p> <p>8 A. No.</p> <p>9 Q. You've said today talc mines</p> <p>10 don't have asbestos in them, haven't you?</p> <p>11 MR. BICKS: Objection to the</p> <p>12 form.</p> <p>13 THE WITNESS: No, I said that</p> <p>14 they do have the mineral, but not the</p> <p>15 asbestos. We're talking about two</p> <p>16 completely different forms, whatever</p> <p>17 the World Organization says.</p> <p>18 QUESTIONS BY MR. LANIER:</p> <p>19 Q. No. Sir, this is what you</p> <p>20 said.</p> <p>21 A. Yeah.</p> <p>22 Q. You said that they don't</p> <p>23 have -- and yet you've said that you get</p> <p>24 traces of asbestos --</p> <p>25 MR. BICKS: Traces of</p>
<p style="text-align: right;">Page 215</p> <p>1 Q. Thank you.</p> <p>2 Exhibit Number 26, principal</p> <p>3 varieties of asbestos, they include</p> <p>4 chrysotile, don't they?</p> <p>5 A. Yes.</p> <p>6 Q. So also we've got chrysotile --</p> <p>7 now, you're not going to fuss that with them,</p> <p>8 are you?</p> <p>9 A. Sorry?</p> <p>10 Q. You're not going to fuss that</p> <p>11 chrysotile is a principal variety?</p> <p>12 A. No.</p> <p>13 Q. They also said that</p> <p>14 anthophyllite is; you're not going to fuss</p> <p>15 that, are you?</p> <p>16 A. No.</p> <p>17 Q. So here you've got something</p> <p>18 where you've published and you have said that</p> <p>19 chrysotile, tremolite and anthophyllite --</p> <p>20 Which are varieties of</p> <p>21 asbestos?</p> <p>22 A. Uh-huh.</p> <p>23 Q. -- is in talc. That's a</p> <p>24 publication you did in 1992, correct?</p> <p>25 A. Yep.</p>	<p style="text-align: right;">Page 217</p> <p>1 tremolite.</p> <p>2 THE WITNESS: Yeah.</p> <p>3 QUESTIONS BY MR. LANIER:</p> <p>4 Q. Oh, that's -- no. No. In the</p> <p>5 Pittsburgh Corning deposition, you said</p> <p>6 asbestos.</p> <p>7 MR. BICKS: Objection to the</p> <p>8 form.</p> <p>9 QUESTIONS BY MR. LANIER:</p> <p>10 Q. You used that word.</p> <p>11 A. Did I?</p> <p>12 MR. BICKS: Objection to the</p> <p>13 form.</p> <p>14 QUESTIONS BY MR. LANIER:</p> <p>15 Q. Yeah. Do you want -- let's</p> <p>16 look at it again, lest there be any concern.</p> <p>17 Do you not remember, sir?</p> <p>18 A. No. It was 1990, wasn't it?</p> <p>19 Q. Well, it's 1990, but I just</p> <p>20 showed it to you a few minutes ago, so we're</p> <p>21 2018 right now.</p> <p>22 Remember?</p> <p>23 A. No, I can't remember back</p> <p>24 28 years.</p> <p>25 Q. Let's just make sure you're on</p>

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<p style="text-align: right;">Page 314</p> <p>1 A. No.</p> <p>2 Q. Okay. So you were in the Val</p> <p>3 Chisone mine.</p> <p>4 How many times did you go over</p> <p>5 there?</p> <p>6 A. I think I went twice to the</p> <p>7 mine.</p> <p>8 Q. Oh, okay. So this -- this</p> <p>9 wasn't for years you were working on it?</p> <p>10 A. No. Only on the samples.</p> <p>11 Q. Only on the samples?</p> <p>12 A. Yeah.</p> <p>13 Q. Well, who did more work on the</p> <p>14 Val Chisone mine than you did?</p> <p>15 A. I have no idea.</p> <p>16 Q. How about the people who run</p> <p>17 the Val Chisone mine?</p> <p>18 A. I've actually never seen what</p> <p>19 work they actually did.</p> <p>20 Q. Whoa. Okay. Timeout. This is</p> <p>21 important.</p> <p>22 You've never seen the work done</p> <p>23 by Val Chisone?</p> <p>24 A. No.</p> <p>25 Q. So Johnson & Johnson didn't</p>	<p style="text-align: right;">Page 316</p> <p>1 So just so that we're real</p> <p>2 clear, even though you may not have seen it,</p> <p>3 you did see -- found tremolite?</p> <p>4 A. Yes.</p> <p>5 Q. It's just your opinion that it</p> <p>6 wasn't of the right size to where you were</p> <p>7 going to say that it was asbestos?</p> <p>8 A. It wasn't asbestiform, no.</p> <p>9 Q. It wasn't the right size for</p> <p>10 you?</p> <p>11 A. It wasn't asbestiform.</p> <p>12 Q. Asbestiform?</p> <p>13 A. Yes.</p> <p>14 Q. Yeah, there's just a difference</p> <p>15 in those words. I just want to make it real</p> <p>16 clear. You're not saying it wasn't asbestos.</p> <p>17 You're saying that -- you've got a -- there's</p> <p>18 the word "asbestos," which is referring to</p> <p>19 the mineral, and the asbestos mineral</p> <p>20 includes tremolite, right?</p> <p>21 A. Yeah.</p> <p>22 Q. And then you've got another</p> <p>23 word you used called "asbestiform."</p> <p>24 A. Yes.</p> <p>25 Q. And that's where you wanted to</p>
<p style="text-align: right;">Page 315</p> <p>1 give you that?</p> <p>2 A. No.</p> <p>3 Q. See, because I was concerned</p> <p>4 about it when I heard you say that Johnson &</p> <p>5 Johnson -- based on your knowledge, if</p> <p>6 Johnson & Johnson, if an issue had been</p> <p>7 identified, then they'd take action.</p> <p>8 A. Yeah.</p> <p>9 Q. And your idea that Johnson &</p> <p>10 Johnson was a reasonable company who never</p> <p>11 pressured you to come up with answers in any</p> <p>12 of your own tests.</p> <p>13 A. Yeah.</p> <p>14 Q. And that Johnson & Johnson was,</p> <p>15 you know, reasonable in their behavior and</p> <p>16 what they did and they put safety first, but</p> <p>17 they never showed you the work by the mine</p> <p>18 company?</p> <p>19 A. No.</p> <p>20 Q. Okay. As a sidenote, you did</p> <p>21 find tremolite in Val Chisone, didn't you?</p> <p>22 A. Yeah, I think -- yeah, excuse</p> <p>23 me, one of the mineral samples, yeah, we</p> <p>24 took.</p> <p>25 Q. Yeah.</p>	<p style="text-align: right;">Page 317</p> <p>1 have your size?</p> <p>2 A. And appearance, yeah.</p> <p>3 Q. Yeah.</p> <p>4 A. Fibers.</p> <p>5 Q. Fibers?</p> <p>6 A. Yeah.</p> <p>7 Q. 3 to 1?</p> <p>8 A. Yeah.</p> <p>9 Q. Ratio?</p> <p>10 A. Yeah, particles below that size</p> <p>11 ratio wouldn't be --</p> <p>12 Q. Asbestiform by your</p> <p>13 definition --</p> <p>14 A. Yeah.</p> <p>15 Q. -- though, they're still</p> <p>16 asbestos?</p> <p>17 MR. BICKS: Objection to the</p> <p>18 form.</p> <p>19 QUESTIONS BY MR. LANIER:</p> <p>20 Q. In terms of the mineral, the</p> <p>21 mineral structure hasn't changed, right?</p> <p>22 A. Yeah.</p> <p>23 Q. Right?</p> <p>24 A. Nope.</p> <p>25 Q. I'm not right?</p>

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<p style="text-align: right;">Page 462</p> <p>1 A. To do what?</p> <p>2 Q. To do these tests.</p> <p>3 A. No, it doesn't say --</p> <p>4 Q. It doesn't say that J&J viewed</p> <p>5 one of your techniques as too sensitive?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Does it?</p> <p>8 A. No.</p> <p>9 MR. BICKS: Objection to the</p> <p>10 form.</p> <p>11 MR. LANIER: All right. Pass</p> <p>12 the witness. We're done. Thank you.</p> <p>13 VIDEOGRAPHER: This marks the</p> <p>14 end of today's deposition. The time</p> <p>15 is 6:03 p.m. We're going off the</p> <p>16 record.</p> <p>17 (Deposition concluded at 6:03 p.m.)</p> <p>18 - - - - -</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 464</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over</p> <p>4 carefully and make any necessary corrections.</p> <p>5 You should state the reason in the</p> <p>6 appropriate space on the errata sheet for any</p> <p>7 corrections that are made.</p> <p>8 After doing so, please sign the</p> <p>9 errata sheet and date it. You are signing</p> <p>10 same subject to the changes you have noted on</p> <p>11 the errata sheet, which will be attached to</p> <p>12 your deposition.</p> <p>13 It is imperative that you return</p> <p>14 the original errata sheet to the deposing</p> <p>15 attorney within thirty (30) days of receipt</p> <p>16 of the deposition transcript by you. If you</p> <p>17 fail to do so, the deposition transcript may</p> <p>18 be deemed to be accurate and may be used in</p> <p>19 court.</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 463</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 I, CARRIE A. CAMPBELL, Registered</p> <p>4 Diplomate Reporter, Certified Realtime</p> <p>5 Reporter and Certified Shorthand Reporter, do</p> <p>6 hereby certify that prior to the commencement</p> <p>7 of the examination, Frederick Pooley, Ph.D.,</p> <p>8 was duly sworn by me to testify to the truth,</p> <p>9 the whole truth and nothing but the truth.</p> <p>10 I DO FURTHER CERTIFY that the</p> <p>11 foregoing is a verbatim transcript of the</p> <p>12 testimony as taken stenographically by and</p> <p>13 before me at the time, place and on the date</p> <p>14 hereinbefore set forth, to the best of my</p> <p>15 ability.</p> <p>16</p> <p>17 I DO FURTHER CERTIFY that I am</p> <p>18 neither a relative nor employee nor attorney</p> <p>19 nor counsel of any of the parties to this</p> <p>20 action, and that I am neither a relative nor</p> <p>21 employee of such attorney or counsel, and</p> <p>22 that I am not financially interested in the</p> <p>23 action.</p> <p>24</p> <p>25 </p> <p>CARRIE A. CAMPBELL, NCRA Registered Diplomate Reporter Certified Realtime Reporter California Certified Shorthand Reporter #13921 Missouri Certified Court Reporter #859 Illinois Certified Shorthand Reporter #084-004229 Texas Certified Shorthand Reporter #9328 Kansas Certified Court Reporter #1715 Notary Public Dated: February 9, 2018</p>	<p style="text-align: right;">Page 465</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2</p> <p>3</p> <p>4 I, _____, do</p> <p>5 hereby certify that I have read the foregoing</p> <p>6 pages and that the same is a correct</p> <p>7 transcription of the answers given by me to</p> <p>8 the questions therein propounded, except for</p> <p>9 the corrections or changes in form or</p> <p>10 substance, if any, noted in the attached</p> <p>11 Errata Sheet.</p> <p>12</p> <p>13 _____</p> <p>14 Frederick Pooley, Ph.D. DATE</p> <p>15</p> <p>16 Subscribed and sworn to before me this</p> <p>17 _____ day of _____, 20 ____.</p> <p>18 My commission expires: _____</p> <p>19</p> <p>20 Notary Public</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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